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Colorado's Continuing Major Source RACT Efforts



AIR POLLUTION CONTROL DIVISION
DISCUSSION with STAKEHOLDERS
(EARLY STAKEHOLDER OUTREACH)
JANUARY 19, 2017



Continued Major Source RACT



- APCD is committed to continuing working with stakeholders to ensure requested RACT analyses are complete and timely
- Today's meeting
 - Discuss universe
 - Discuss process
 - Discuss timing



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RACT Basics



- Moderate Ozone NAAs are required to implement RACT
- RACT level controls required for:
 - All VOC source categories subject to a CTG
 - Major sources of VOCs or NO_x
- RACT - “lowest emission limitation that a particular source is capable of meeting by the application of control technology that is reasonably available considering technological and economic feasibility”
- RACT analysis must reflect the “latest information”



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Considerations



- Differences in RACT - SIP vs. permit
 - categorical vs. source specific
 - existing vs. new/modified
- Reasonably available, technologically and economically feasible
- RACT may range from nothing more to work practices to add-on controls
- 2008 vs. 2015 O3 standard

Universe



- Sources/points listed in Regulation 7, Section XIX.B.
- Additional sources/points
 - CIG
 - ✦ Latigo Compressor Station (engines 001 & 011)
 - ✦ Watkins Compressor Station (engines 001, 002 & 005)
 - CENC (boilers 001 & 002)
 - Kerr McGee Gathering Platte Valley Gas Plant (turbine 052; engines 038-041, 047-049)
 - PSCo
 - ✦ Denver Steam Plant (boilers 001 & 002)
 - ✦ Zuni Station (boilers 001-003)
 - ✦ Ft. Lupton Plant (turbines 001 & 002)
 - ✦ Valmont Station (turbine 002)
 - WGR Wattenberg Gas Processing Plant (boiler 012; turbine/duct burner 021; engines 004 and 018)



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Process



- Quarterly meetings/calls with stakeholders
- Targeted discussions with industry/representatives
 - Equipment/process specific
 - RACT analysis related
 - Completion status
- Periodic briefings to RAQC and AQCC
- Categorical rule development for:
 - Engines
 - Boilers
 - Turbines
 - Glass melters
 - Shale kilns
 - Brewing related operations



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Timing



- 2017

- Work w/ industry
- Investigate established RACT for source categories

- 2018

- Evaluate RACT analyses
- Identify source category RACT options
- Rulemaking to establish categorical RACT for:
 - ✦ Boilers
 - ✦ Turbines
 - ✦ Glass melters
 - ✦ Shale kilns

Request: 7/19/18
Hearing: 10/18/18

- 2019

- Rulemaking to establish categorical RACT for Engines
(Request: 4/18/19; Hearing: 7/18/19)
- Rulemaking to establish categorical RACT for Brewing/Related Operations
(Request: 7/18/19; Hearing: 10/17/19)

- 2020 +

- Comply with RACT requirements



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Related Issues



- **Scope**
 - Number/source types/site specifics
 - New SIP rules, revising SIP rules and state-only options
- **Process**
 - SIP RACT establishing categorical rules
 - Existing equipment
 - 2015 O3 Standard and associated Implementation Guidance
- **Timing**
 - RACT analysis
 - Rule development
 - Implementation
 - EPA actions



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Next Steps



- Establish industry forum(s)
- Hold quarterly mtgs/calls w/ all stakeholders
 - Next mtg/call? March 15, 2017 @ 10-11 AM
- Brief RAQC and AQCC periodically

Questions?



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